

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

IN RE: GANESH ARORA  
SHIWANI ARORA

CASE NO.: 3:17-bk-02961-JAF  
CHAPTER 11

Debtors

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**MOTION TO AVOID JUDICIAL LIEN**  
**(X-RAY REPAIR AND SALES)**

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**NOTICE OF OPPORTUNITY TO  
OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider this relief requested in this paper without further notice or hearing unless a party in interest files a response within 30 days from the date of set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at 300 N. Hogan Street, Suite 3-150, Jacksonville, Florida 32202, and serve a copy on the movant's attorney Taylor J. King, 5452 Arlington Expressway, Jacksonville, Florida 32211, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

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In accordance with 11 U.S.C., Section 522(f)(1), the Debtors move this Court for entry of an Order avoiding any claimed Judicial Lien of X-Ray Repair & Sales, Inc. (Account No.: Unknown) for the homestead real property of the Debtors as more particularly described:

Lot(s) 19, of Avalon, Unit 2, Phase 2 as recorded in Plat Book R, Pages 54, et seq., of the public records of Alachua County, Florida; a/k/a

1716 SW 82<sup>nd</sup> Drive, Gainesville, Florida 32607.

At the time of the recording of the Final Judgment, and at the time of the filing of the Petition herein, and at all other times, the Debtors resided on certain real property located in Alachua County, Florida.

The Debtors claimed the attached real property as exempt in the Schedule of real property filed on behalf of the Debtors in this case. No objection was made to said exemption.

The Final Judgment of X-Ray Repair & Sales, Inc. as recorded in O.R. Book 4434, Page 990 and

all other recordings in the official records of Alachua County, Florida impairs the homestead exemption to which the Debtors would have been entitled to under 11 U.S.C., Section 522(b).

The foregoing real property is exempt in accordance with the provisions of Article X, Section IV, of the Florida Constitution.

**PROOF OF SERVICE**

Before me came TAYLOR J. KING, being duly sworn deposes and says that a copy of the foregoing Motion to Avoid Judicial Lien, together with the Debtors' Affidavit was mailed by U.S. Mail, postage prepaid and/or CM/ECF electronic filing to:

Gordon P. Jones  
Chapter 7 Trustee  
P O Box 600459  
Jacksonville, FL 32260-0459

which is the place he regularly conducts his business; and to

X-Ray Repair & Sales, Inc.  
Bryan Coombs, Registered Agent  
5680 SE 22<sup>nd</sup> Place  
Ocala, Florida 34480

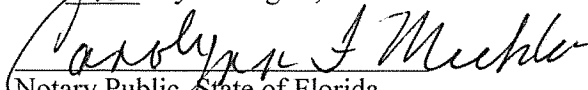
which is the place he regularly conducts his business; and to

X-Ray Repair & Sales, Inc.  
c/o Patrick G. Gilligan, Esq.  
1531 SE 36<sup>th</sup> Avenue  
Ocala, Florida 34471

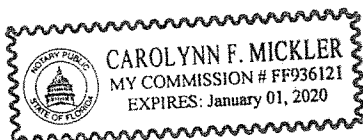
which is the place he regularly conducts his business.

this 10 day of August, 2018.

Sworn to and subscribed before me  
this 10 day of August, 2018.

  
\_\_\_\_\_  
Notary Public, State of Florida  
at Large

My Commission Expires:



Law Offices of Mickler & Mickler

By:   
\_\_\_\_\_  
TAYLOR J. KING

Attorney for Debtor  
5452 Arlington Expressway  
Jacksonville, Florida 32211  
(904) 725-0822/FAX: 725-0855  
Florida Bar No. 072049

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
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SHIWANI ARORA

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**DEBTORS' AFFIDAVIT IN SUPPORT OF DEBTOR'S MOTION  
TO AVOID JUDICIAL LIEN**

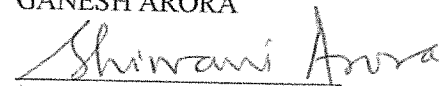
STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

Before me came, GANESH ARORA and SHIWANI ARORA, who being duly sworn deposes and states:


1. This Affidavit is submitted in support of the Debtors' Motion to Avoid Judicial Lien.
2. Your Affiants are the Debtors in the above-captioned case.
3. The Debtors make this Affidavit in support of their contemporaneously filed Motion to Avoid Judicial Lien.
4. The Debtors are proceeding under 11 U.S.C., Section 522(f)(1).
5. The property involved is real property as more particularly described as:  
  
Lot(s) 19, of Avalon, Unit 2, Phase 2 as recorded in Plat Book R, Pages 54, et seq., of the public records of Alachua County, Florida; a/k/a 1716 SW 82<sup>nd</sup> Drive, Gainesville, Florida 32607.
6. The Debtors seek to avoid a Judicial Lien of X-Ray Repair & Sales, Inc. (Acct No.: Unknown) as recorded in O.R. Book 4434, Page 990 and all other recordings in the official records of Alachua County, Florida.
7. The property is of the type contemplated by Subsection (1).
8. The property was claimed as exempt on Debtors' Schedule C.
9. The real property is described in the listing on the Debtors' Schedule of real property.
10. The amount of the value claimed as exempt is \$343,900.00.

11. The fair market value of the property claimed as exempt is \$343,900.00.
12. The amount of the debt claimed by the creditor is \$86,528.23, together with the accrued interest and Court costs.
13. The property has been declared exempt by the Debtors.
14. The property is claimed as exempt under the Florida Constitution, Article X, Section IV, and Florida Statute 222.01.

  
GANESH ARORA

  
SHIWANI ARORA

Sworn to and subscribed before me  
this 9<sup>th</sup> day of August, 2018.

  
Notary Public, State of Florida  
at Large

My Commission Expires: 8 24.19

